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Attorneys for Defendants  
Reliable Credit Association, Inc., and  
Reliable Credit Association, Inc. (WA)

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

HOLLY SMART, an individual,

Case No. 2:18-cv-448-JCC

Plaintiff,

v.

EMERALD CITY RECOVERY, LLC,  
RELIABLE CREDIT ASSOCIATION,  
INC. AND RELIABLE CREDIT  
ASSOCIATION, INC. (WA),

Defendants.

DECLARATION OF KIMBERLEY HANKS  
MCGAIR IN SUPPORT OF RELIABLE  
CREDIT ASSOCIATION, INC., AND  
RELIABLE CREDIT ASSOCIATION, INC.  
(WA)'S MOTION FOR EXTENSION OF  
TIME TO RESPOND TO PLAINTIFF'S  
COMPLAINT

I, Kimberley Hanks McGair, hereby declare as follows:

(1) I am one of the attorneys representing Defendants Reliable Credit Association, Inc., and Reliable Credit Association, Inc. (WA) (collectively, "Reliable") and I have personal knowledge of the facts set forth in this Declaration.

(2) The parties need time to confer regarding potential motions that Reliable may bring against the complaint. If the parties are unable to resolve those issues, Reliable intends to move for dismissal.

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(3) Counsel for Plaintiff does not object to this motion. This motion is made in good faith and is not intended for the purposes of delay, and no party will be prejudiced by the granting of this motion.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE  
BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE  
FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED April 25, 2018.

FARLEIGH WADA WITT

By: /s/ Kimberley Hanks McGair  
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Attorneys for Defendants Reliable Credit  
Association, Inc., and Reliable Credit  
Association, Inc. (WA)

**CERTIFICATE OF SERVICE**

I hereby certify that on April 25, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Christopher Green  
GreenLawFirm  
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[Chris@MyFairCredit.com](mailto:Chris@MyFairCredit.com)  
Attorney for Plaintiff

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